

U. S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED

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AUG 02 2007

ROBERT H. SHEWELL, CLERK
BY DEPUTY
SHREVEPORT

CIVIL SUIT NO: 107959

EDDIE MAE WILLIAMS WASHINGTON

VERSUS

AIS SERVICES, LLC, ET AL

CITY OF ALEXANDRIA COURT

PARISH OF RAPIDES

STATE OF LOUISIANA

2007 JUN 19 PM 1:56

Linda Webster
CLERK OF COURT

Deputy

PETITION

NOW INTO COURT, through undersigned counsel, comes Eddie Mae Williams Washington, being of the full age of majority and a resident of Alexandria, Rapides Parish, Louisiana, who respectfully represents as follows, to wit:

1.

Made defendants herein are:

- a. Chase Manhattan Bank USA, N.A. a/k/a Chase Platinum Mastercard a/k/a The Chase Manhattan Corporation, Customer Security Operations, 150 W. University Drive, Mail Stop AZ2-G308, Tempe, AZ 85281; authorized to do and doing business in the State of Louisiana, whose registered agent is C T Corporation System, 601 Poydras Street, New Orleans, LA 70130
- b. AIS Services, LLC, 50 California Street, Suite 1500, San Francisco, CA 94111, authorized to do and doing business in the state of Louisiana, whose registered agent is CT Corporation System, 8550 United Plaza Boulevard, Baton Rouge, LA 70809
- c. Equifax, P.O. Box 740256, Atlanta, GA 30374; authorized to do and doing business in the state of Louisiana, whose registered agent is The Prentice-Hall Corporation System, Inc., 320 Somerulos Street, Baton Rouge, LA 70802-6129.

- d. TransUnion Consumer Relations, P.O. Box 2000, Chester, PA 19022-2000
- e. Experian, NCAC, Post Office Box 9701, Allen, TX 75013

Each defendant is domiciled and/or authorized to do and/or doing business in the state of Louisiana at pertinent times herein.

2.

Petitioner Eddie Mae Williams Washington is the wife of Clifton L. Washington, II. Clifton L. Washington, II filed for Chapter 7 Bankruptcy bearing Case No. 04-82255 on November 22, 2004. One of the debts of this bankruptcy was Chase Platinum Mastercard and/or The Chase Manhattan Corporation, Chase Manhattan Bank USA, N.A., Account No. 5543076610078985. Chase Platinum Mastercard and/or The

Chase Manhattan Corporation, Chase Manhattan Bank USA, N.A. was properly scheduled, and officially and formally notified by the U.S. Bankruptcy Court of this Bankruptcy filing. A copy of the Discharge of Debtor is attached hereto as Exhibit A.

3.

Petitioner Eddie Mae Williams Washington and Clifton L. Washington, II are not in a community property regime by evidence of the enclosed "Judgment of Separation of Property" dated December 18, 2002; attached hereto as Exhibit B.

4.

Petitioner Eddie Mae Williams Washington never used the subject credit card, made no charges against the subject credit card, and is not responsible in any way whatsoever and owes no indebtedness whatsoever to defendant(s). Eddie Mae Williams Washington is not responsible for any debts on the accounts/credit card(s) of defendants nor for any debt created by Clifton L. Washington.

5.

Despite amicable demand letters to defendants to cease and desist all contact with plaintiff to cease damaging credit reports, and to remedy damage to credit, defendants have persisted in harassing plaintiff by demand letters, telephone calls, and by purposefully and wrongfully damaging and ruining plaintiff's credit rating even though defendants have full knowledge that plaintiff does not owe any debt to them. Eddie Mae Williams Washington is still receiving negative credit reports from AIS Services, LLC (see Exhibit C attached hereto).

6.

The acts and omissions of defendants are tortious and in violation of Louisiana law. Petitioner shows that defendants have wrongfully harassed petitioner by their wrongful and negligent acts and omissions. Defendants have engaged in unfair trade and credit practices.

7.

Petitioner is entitled to a Judgment declaring that Eddie Mae Williams Washington is not liable nor responsible for Chase Platinum Mastercard Account No. 5543076610078985 nor any other account of defendants; that defendant(s) be ordered

to remedy, correct and restore the credit history of Eddie Mae Williams Washington to an excellent credit rating; that defendants be ordered to remove and delete any and all indebtedness (set forth herein) from any and all future credit reports regarding plaintiff; that Petitioner be awarded recovery of damages due to defendant(s) tortious conduct and violation of law, together with legal interest from the date of judicial demand; that Defendants be directed to remedy plaintiff's credit record; the petitioner be granted further recovery from defendant(s) of attorney fees, penalties including treble damages, allowable under the Louisiana Revised Statutes, including Title 9 and Title 51 of the Louisiana Revised Statutes and other applicable state law, and all costs of these proceedings.

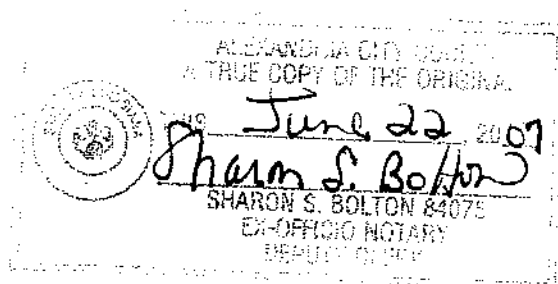
WHEREFORE, petitioner Eddie Mae Williams Washington prays that defendants Chase Platinum Mastercard, The Chase Manhattan Corporation, Chase Manhattan Bank USA, N.A., AIS Services, Inc., TransUnion Consumer Relations, Experian NCAC, and Equifax be served and cited according to law, and after all legal delays have elapsed and due proceedings had, there be judgment rendered herein against the defendants, in solido, and in favor of Eddie Mae Williams Washington, for full recovery and remedy as sought in this petition and legal interest; that Petitioner be awarded recovery for damages due to defendants tortious conduct and violations of law, together with legal interest from date of judicial demand; the petitioner be granted full recovery from defendants of attorney fees, penalties including treble damages and all costs of these proceedings.

Petitioner further prays for all general and equitable relief.

Respectfully submitted,



JOHN W. SCOTT # 11879
934 Third Street, Suite 401
Post Office Box 171
Alexandria, Louisiana 71309
Telephone: 318/445-1474
Attorney for petitioner Eddie Mae Williams
Washington



PLEASE SERVE:

1. Chase Platinum Mastercard and/or The Chase Manhattan Corporation, Chase Manhattan Bank USA, N.A., through their registered agent CT Corporation System, 601 Poydras Street, New Orleans, LA 70130
2. AIS Services, LLC, 50 California Street, Suite 1500, San Francisco, CA 94111, through their registered agent CT Corporation System, 8550 United Plaza Boulevard, Baton Rouge, LA 70809
3. Equifax, P.O. Box 740256, Atlanta, GA 30374; through its registered agent The Prentice-Hall Corporation System, Inc., 320 Somerulos Street, Baton Rouge, LA 70802-6129.

RETURN FOR SERVICE THROUGH LONG ARM STATUTE

4. TransUnion Consumer Relations, P.O. Box 2000, Chester, PA 19022-2000
5. Experian, NCAC, Post Office Box 9701, Allen, TX 75013

ALEXANDRIA CITY COURT

2007 JUN 19 PM 2:28

Denise J. Webster
CLERK OF COURT - *Deputy*

B18 (7/99)

United States Bankruptcy Court

Western District of Louisiana

Case No. 04-82255

Chapter 7

In re: (Name of Debtor)

Clifton L. Washington II (*debtor has no known aliases*)

304 Regan Drive

Alexandria, LA 71303-2232

Social Security No.:

xxx-xx-2478

Employer's Tax I.D. No.:

DISCHARGE OF DEBTOR

It appearing that the debtor is entitled to a discharge,

IT IS ORDERED :

The debtor was granted a discharge under section 727 of title 11, United States Code, (the Bankruptcy Code).

BY THE COURT

Dated: 4/13/05

/s/Henley A. Hunter

United States Bankruptcy Judge

SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION.

*Set forth all names, including trade names, used by the debtor within the last 6 years. (Federal Rule of Bankruptcy Procedure 1005).

FORM B18 continued (7/99)

EXPLANATION OF BANKRUPTCY DISCHARGE IN A JOINT CHAPTER 7 CASE

This court order grants a discharge to the persons named as the debtors. It is not a dismissal of the case and it does not determine how much money, if any, the trustee will pay to creditors.

Collection of Discharged Debts Prohibited

The discharge prohibits any attempt to collect from the debtors a debt that has been discharged. For example, a creditor is not permitted to contact a debtor by mail, phone, or otherwise, to file or continue a lawsuit, to attach wages or other property, or to take any other action to collect a discharged debt from the debtors. *[In a case involving community property: There are also special rules that protect certain community property owned by the debtor's spouse, even if that spouse did not file a bankruptcy case.]* A creditor who violates this order can be required to pay damages and attorney's fees to the debtor.

However, a creditor may have the right to enforce a valid lien, such as a mortgage or security interest, against the debtors' property after the bankruptcy, if that lien was not avoided or eliminated in the bankruptcy case. Also, a debtor may voluntarily pay any debt that has been discharged.

Debts That are Discharged

The chapter 7 discharge order eliminates a debtor's legal obligation to pay a debt that is discharged. Most, but not all, types of debts are discharged if the debt existed on the date the bankruptcy case was filed. (If this case was begun under a different chapter of the Bankruptcy Code and converted to chapter 7, the discharge can apply to debts owed when the bankruptcy case was converted if proper notice is given to creditors.)

Debts that are Not Discharged

Some of the common types of debts which are not discharged in a chapter 7 bankruptcy case are:

- a. Debts for most taxes;
- b. Debts that are in the nature of alimony, maintenance, or support;
- c. Debts for most student loans;
- d. Debts for most fines, penalties, forfeitures, or criminal restitution obligations;
- e. Debts for personal injuries or death caused by the debtor's operation of a motor vehicle while intoxicated;
- f. Some debts which were not properly listed by the debtor;
- g. Debts that the bankruptcy court specifically has decided or will decide in this bankruptcy case are not discharged;
- h. Debts for which the debtor has given up the discharge protections by signing a reaffirmation agreement in compliance with the Bankruptcy Code requirements for reaffirmation of debts.

This information is only a general summary of the bankruptcy discharge. There are exceptions to these general rules. Because the law is complicated, you may want to consult an attorney to determine the exact effect of the discharge in this case.

CIVIL SUIT NO. 211,317
DIVISION "D"

IN RE DR. CLIFTON L. WASHINGTON, II
AND EDDIE MAE WILLIAMS-
WASHINGTON APPLYING FOR
APPROVAL OF CONTRACT
FOR SEPARATION
OF PROPERTY REGIME

NINTH JUDICIAL DISTRICT COURT
PARISH OF RAPIDES
STATE OF LOUISIANA

JUDGMENT OF SEPARATION OF PROPERTY

Considering the foregoing Joint Petition, and the evidence adduced at the hearing on this matter, the Court expressly finds and determines pursuant to C.C. article 2329 that both spouses understand the governing rules and principles of both their existing matrimonial regime and the regime of separate property that they wish to enter into.

The Court further finds and determines pursuant to C.C. article 2329 that granting this Judgment of Separation of Property is in the best interest of the spouses so as to allow them to terminate the legal matrimonial regime of community property and enter into a separation of property agreement, as both spouses intelligently and knowingly desire to enter into a matrimonial regime governed by a different system of principles and rules than that provided by the community property regime set forth in the Louisiana Civil Code.

COPY

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Dr. Clifton L. Washington, II and Eddie Mae Williams-Washington are hereby authorized to enter into the "Matrimonial Agreement of Separation of Property" attached to the Joint Petition terminating the legal community of acquets and gains and establishing a separation of property regime, and that the actions in so proceeding is expressly approved in strict accordance with LSA-C.C. article 2329.

FILED & RECORDED
ARLYN RYLAND
CLERK
02 DEC 18 PM 2:12
NEW ORLEANS, LA

JUDGMENT RENDERED AND SIGNED, this 18th day of Dec. 2002, in Alexandria, Louisiana.

George C. Petoye Jr.
JUDGE, NINTH JUDICIAL DISTRICT COURT

March 25, 2007

CREDIT ALERT

Eddie Mae Williams Washington
304 Ragan Dr.
Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name

Potentially Negative Information	Experian	Equifax	TransUnion
An item is "potentially negative" when a creditor reports that you have not met the terms of your agreement with them, which may include late payments, accounts that have been charged off, accounts sent to collection, bankruptcies, liens, judgments, etc.			
Alert Date Mar 25, 2007	Business Name AIS SERVICES LLC		
	Status Date Jul 2006		
	Balance Amount \$9,728		
	Balance Date Jul 2006		
	Status Detail Collections		

March 8, 2007

CREDIT ALERT

Eddie Mae Williams Washington
304 Ragan Dr.
Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name

Potentially Negative Information	Experian	Equifax	TransUnion
An item is "potentially negative" when a creditor reports that you have not met the terms of your agreement with them, which may include late payments, accounts that have been charged off, accounts sent to collection, bankruptcies, liens, judgments, etc.			
Alert Date Mar 2, 2007	Business Name AIS SERVICES LLC		
	Status Date Jul 2006		
	Balance Amount \$9,728		
	Balance Date Jul 2006		
	Status Detail Collections		

CREDIT ALERT

uary 18, 2007

lie Mae Williams Washington
 4 Ragan Dr.
 xandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name.

Potentially Negative Information		Experian	Equifax	TransUnion
An item is "potentially negative" when a creditor reports that you have not met the terms of your agreement with them, which may include late payments, accounts that have been charged off, accounts sent to collection, bankruptcies, liens, judgments, etc.				
Alert Date Feb 4, 2007	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,648 Jul 2006 Collections		
Alert Date Feb 17, 2007	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,728 Jul 2006 Collections		
Alert Date Feb 18, 2007	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,728 Jul 2006 Collections		

CREDIT ALERT

February 17, 2007

Jie Mae Williams Washington
 4 Ragan Dr.
 Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name.

Potentially Negative Information		Experian	Equifax	TransUnion
An item is "potentially negative" when a creditor reports that you have not met the terms of your agreement with them, which may include late payments, accounts that have been charged off, accounts sent to collection, bankruptcies, liens, judgments, etc.				
Alert Date Feb 4, 2007	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,648 Jul 2006 Collections		
Alert Date Feb 17, 2007	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,728 Jul 2006 Collections		

February 4, 2007

CREDIT ALERT

Eddie Mae Williams Washington
304 Ragan Dr.
Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name.

Potentially Negative Information		Experian	Equifax	TransUnion
An item is "potentially negative" when a creditor reports that you have not met the terms of your agreement with them, which may include late payments, accounts that have been charged off, accounts sent to collection, bankruptcies, liens, judgments, etc.				
Alert Date Feb 4, 2007	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,648 Jul 2006 Collections		

December 24, 2006

CREDIT ALERT

Eddie Mae Williams Washington
 304 Ragan Dr.
 Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name.

New Inquiries	Experian	Equifax	TransUnion
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The following inquiries are "hard" or voluntary inquiries and were generated because you authorized the companies listed to request a copy of your credit report.

Alert Date Dec 21, 2006	Business Name Inquiry Date	AIS SERVICES LLC 12/20/2006
Alert Date Dec 23, 2006	Business Name Inquiry Date	AIS SERVICES LLC 12/22/2006

Potentially Negative Information	Experian	Equifax	TransUnion
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An item is "potentially negative" when a creditor reports that you have not met the terms of your agreement with them, which may include late payments, accounts that have been charged off, accounts sent to collection, bankruptcies, liens, judgments, etc.

Alert Date Dec 24, 2006	Business Name Status Date Balance Amount Balance Date Status Detail	AIS SERVICES LLC Jul 2006 \$9,644 Jul 2006 Collections
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December 23, 2006

CREDIT ALERT

Eddie Mae Williams Washington
304 Ragan Dr.
Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name.

New Inquiries	Experian	Equifax	TransUnion
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The following inquiries are "hard" or voluntary inquiries and were generated because you authorized the companies listed to request a copy of your credit report.

Alert Date Dec 21, 2006	Business Name Inquiry Date	AIS SERVICES LLC 12/20/2006
Alert Date Dec 23, 2006	Business Name Inquiry Date	AIS SERVICES LLC 12/22/2006

December 21, 2006

CREDIT ALERT

Eddie Mae Williams Washington
304 Ragan Dr.
Alexandria, LA 71303-2232

As a CreditSecure® enrollee, this automatic notification letter has been sent to you because activity has been recently posted to your Experian, Equifax, or TransUnion credit file(s).

Remember, CreditSecure® provides you with up-to-date information regarding new inquiries into your credit history, potentially negative information added to your credit file, address changes reported by the credit reporting companies, public records and new accounts opened in your name.

New Inquiries	Experian	Equifax	TransUnion
The following inquiries are "hard" or voluntary inquiries and were generated because you authorized the companies listed to request a copy of your credit report.			
Alert Date Dec 21, 2006	Business Name Inquiry Date	AIS SERVICES LLC 12/20/2006	

DEPT.543
PO BOX 4115
CONCORD CA 94524



ADDRESS SERVICE REQUESTED

#BWNFTZF #AIS1384006406094#



Eddie Washington
304 RAGAN DR
ALEXANDRIA LA 71303-2232

AIS Services, LLC

50 California Street, Suite 1500
San Francisco, CA 94111
info@aiservicesllc.com
Phone: 888-920-1300
Office Hours: Mon-Fri 8am-5pm PT

September 11, 2006

Original Creditor: CHASE MANHATTAN BANK
Original Account #: 5543076610078985
Total Due: \$9,414.26
Our File #: 860516



Dear Eddie Washington:

Please be advised that our firm has recently purchased your account with CHASE MANHATTAN BANK. All rights and security interest have been transferred to AIS Services, LLC. All inquiries, payments, and/or correspondence should be directed to this office.

We will assume the debt to be valid unless you dispute its validity within thirty (30) days after receiving this notice. If you notify us in writing within the 30-day period that the debt or any part thereof is disputed, we will obtain verification of the debt and mail you in writing the name and address of the original creditor (if different from the current creditor).

Please contact us today to set up a payment plan that works for you! We can be reached by telephone at **1-888-920-1300** or on the Internet at www.payais.com.

This letter is from a debt collector. The purpose of this letter is to collect a debt.
Any information obtained will be used for that purpose.

Please include our file number on all correspondence.

Make an offer to settle your account on-line today! Visit www.payais.com

John W. Scott
Post Office Box 171
Alexandria, LA 71309



7005 1160 0000 17



0000

19022

U.S. POSTAGE
PAID
ALEXANDRIA, LA
71301-07
JUL 03, 07
AMOUNT

\$5.72

00050749-08

**RETURN RECEIPT
REQUESTED**

Transunion Consumer Relations
Post Office Box 2000
Chester, PA 19022-2000